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9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA –SAN FRANCISCO DIVISION

11 In RE:

12 BERNOR, BRUCE

13 Debtor.

Case No: 11-32252-TEC

Chapter 7

**MOTION TO COMPEL
ABANDONMENT OF DEBTOR'S
BUSINESS**

Hon. Thomas E. Carlson

19 BRUCE BERNOR, hereinafter Debtor, hereby files his Motion to Compel
20 Abandonment pursuant to 11. U.S.C. § 554(b) and in support thereof respectfully
21 submits as follows:

22 Debtor, through his attorney of record, Scott J. Sagaria, respectfully requests
23 that the Court order the Chapter 7 Trustee to abandon Debtor's business, located at
24 2906 Octavia Street, San Francisco, CA 94123 (hereinafter "Business")

25 This motion is and will be made upon the grounds that Debtor's wildcard
26 exemption covers all assets of the business, creating no equity for the benefit of
27 creditors and therefore no benefit to the estate. Debtor has valued his inventory at
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1 approximately \$8,000 and has fully exempted the inventory and any associated
2 goodwill in Schedule C of the schedules filed with this court.

3 This Motion is based upon the Notice, this Motion, the Memorandum of Points
4 and Authorities, the Declaration of Bruce Bernor, on the papers and records on file
5 herein, and on such oral and documentary evidence as may be presented at the
6 hearing on the Motion, if needed.

7 Any opposition to the Motion must be in writing and in conformity with Local
8 Bankruptcy Rules and must be served upon the undersigned at the address set forth
9 in the upper left-hand corner of this motion and upon the Chapter 7 Trustee, United
10 States Trustee, and filed with the Court no later than 21 days prior to the hearing and
11 that failure to file and serve opposition in conformity with the foregoing may be
12 deemed consent to the relief sought.
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15 Dated: October 11, 2011

16 /s/ Scott Sagaria
17 SCOTT SAGARIA
18 Attorney for Debtor
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